



Environmental Remediation Group

Olin Corporation

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SENT VIA ELECTRONIC MAIL

March 06, 2020

Ms. Lynne Jennings and Ms. Melanie Morash
U. S. Environmental Protection Agency (USEPA), Region 1
5 Post Office Square, Suite 100,
Mail Stop OSRR07-4, Boston, MA 02109-3912

**RE: Response to USEPA Comments and Conditional Approval
Comprehensive Data Gaps Work Plan – Phase I
Olin Chemical Superfund Site (OCSS; “Site”) – Wilmington, MA**

Dear Ms. Jennings and Ms. Morash:

This letter is in response to USEPA comments, dated January 31, 2020, on Olin’s Data Gaps Work Plan (DGWP; dated August 02, 2019) and the follow-up meeting between USEPA (L. Jennings) and Olin (J. Cashwell) on February 10, 2020. As discussed and agreed during the February 10 meeting, Phase I of the DGWP implementation will be divided into two sub-phases:

- Phase IA: Geophysical investigations (e.g., seismic surveys, AEM survey, and supplemental EM/GPR surveys).
- Phase IB: Field confirmation investigations, monitoring well(s)/gauging station installations, and associated sampling/data collection efforts. The details for Phase IB (e.g., number and location of borings/sampling locations; wells installation methods; analytes list) will be developed and discussed with USEPA after reviewing the Phase IA data.

With respect to general and specific comments detailed in USEPA’s January 31 transmittal, relevant DGWP figures have been updated and the revised figures are included herewith. Specifically,

- Seismic line locations have been updated as recommended by USEPA and each target area seismic survey will be supplemented with 2 EM lines (Figures 3, 4, 5, 7, and 8);
- The low-frequency GPR work recommended in the Jewel Drive area (Figure 4) will be implemented concurrently with the seismic survey work.

As you know, all the proposed activities and surveys are contingent upon access and maybe adjusted in the field during implementation.

As discussed, Olin is incorporating USEPA comments and updating the relevant appendices of the DGWP (e.g., Site Management Plan and Community Relations Support Plan; Standard Operating Procedures [SOPs]). The updated appendices will be submitted under separate cover. Phase IA field work will be initiated after USEPA's review/approval of these Appendices.

The DGWP and the associated efforts continue to evolve and appropriate decisions can only be made in phases or subphases as more data are collected. Hence, as discussed, response to USEPA comments relevant to Phases II and III of the DGWP will be addressed upon completion of the Phases IA and IB activities.

Please respond to this letter with your concurrence on the proposed approach or let us know if you have any questions.

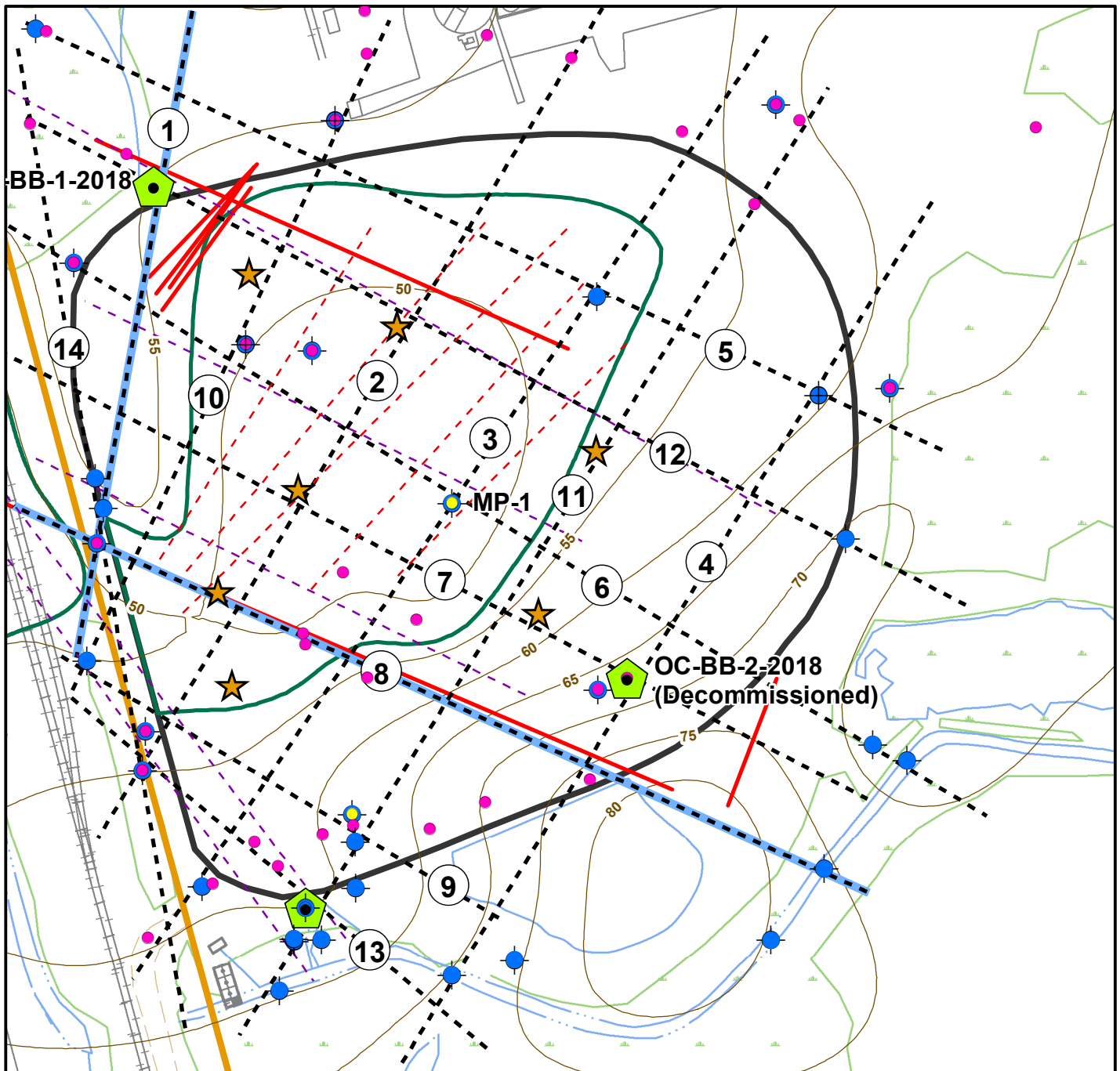
Sincerely,
OLIN CORPORATION

A handwritten signature in black ink, consisting of a stylized 'J' followed by a horizontal line.

James M. Cashwell
Director, Environmental Remediation

Enclosure

cc: Chinny Esakkipperumal (Olin)
Andy Davis (Geomega)
Steven Humphrey (Geomega)
Libby Bowen (Wood)



★ Tentative confirmatory boring

● Existing bedrock well

● Existing boring to bedrock

● Existing S/D groundwater well

● Existing well/bore with geophysical logs

— Proposed EM line

① EPA proposed seismic lines

--- Structural fractures, Brandon (2018)

--- Structural fractures, Brandon (2018)

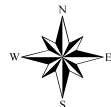
— Inferred faults (USEPA 2018a)

— Bedrock Surface Contours

— 51 Eames St. Property Boundary

— Approximate DAPL Pool Delineation

— Containment Area



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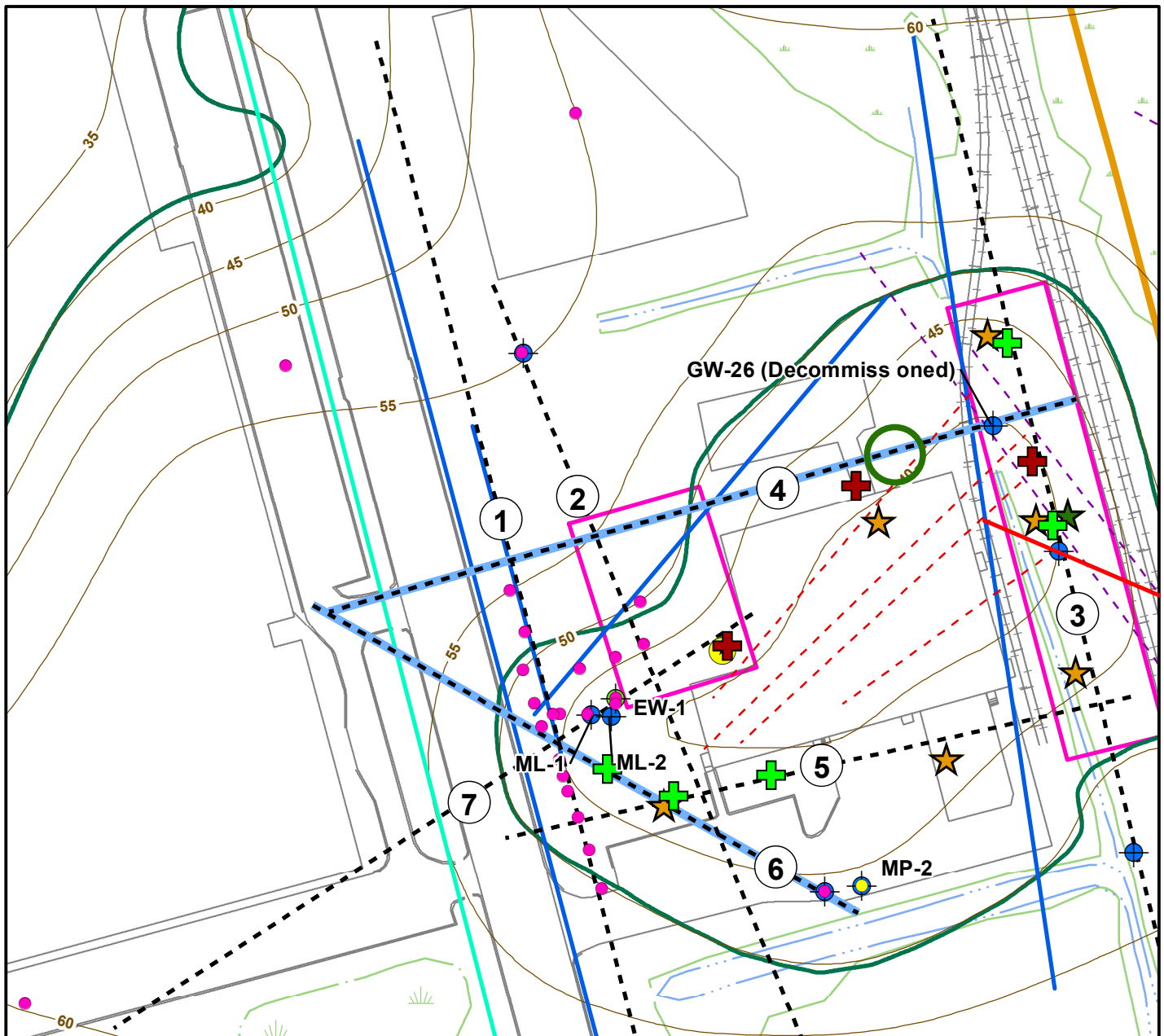


2/19/20

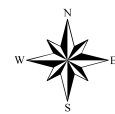
C181086
Olin

Containment area showing proposed seismic lines
and tentative confirmatory/monitoring wells.

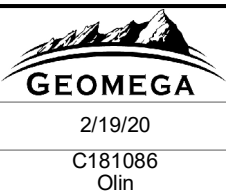
Figure
3



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|---|--|--|
| <ul style="list-style-type: none"> + EPA proposed confirmatory boring + EPA proposed extraction wells ★ Proposed MP location ★ Tentative confirmatory boring ★ Potential angle bore location ● Existing bedrock well ● Existing boring to bedrock ● Existing extraction well ● Existing S/D groundwater well | <ul style="list-style-type: none"> ● Existing well/bore with geophysical logs --- Structural fractures, Brandon (2018) --- Structural fractures, Brandon (2018) -①- EPA proposed seismic lines — Proposed EM line — Inferred faults (USEPA 2018a) — Existing seismic refraction lines — Existing seismic reflection lines — Bedrock Surface Contours --- Approximate DAPL Pool Delineation — 51 Eames St. Property Boundary | <ul style="list-style-type: none"> EPA proposed GPR Tentative geophysics/monitoring well (Phase II) |
|---|--|--|

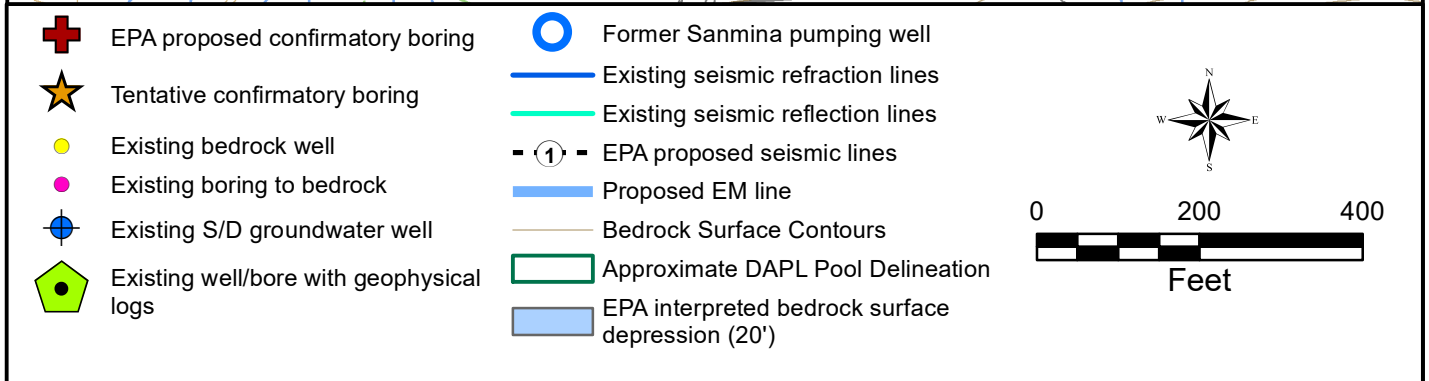
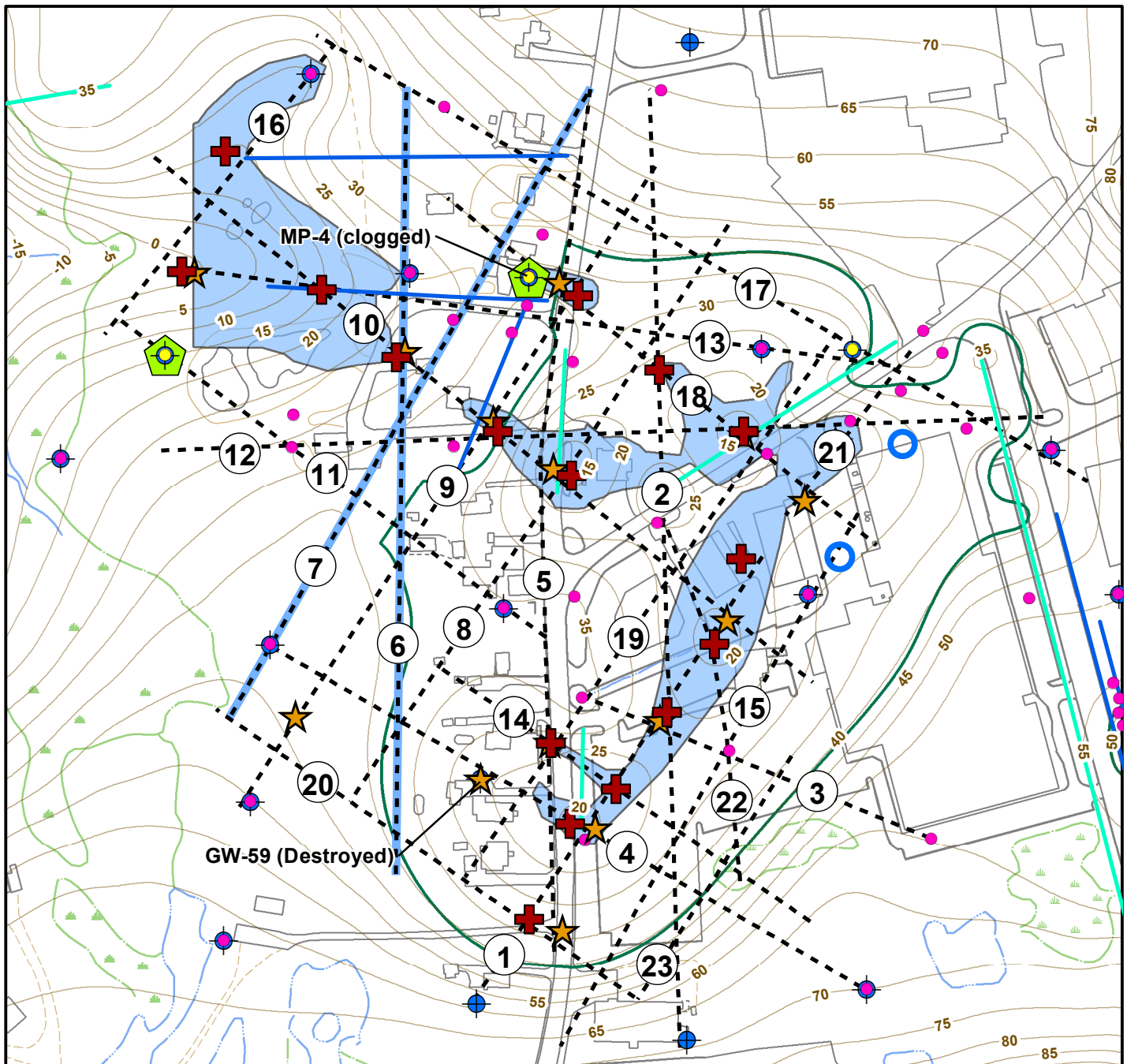



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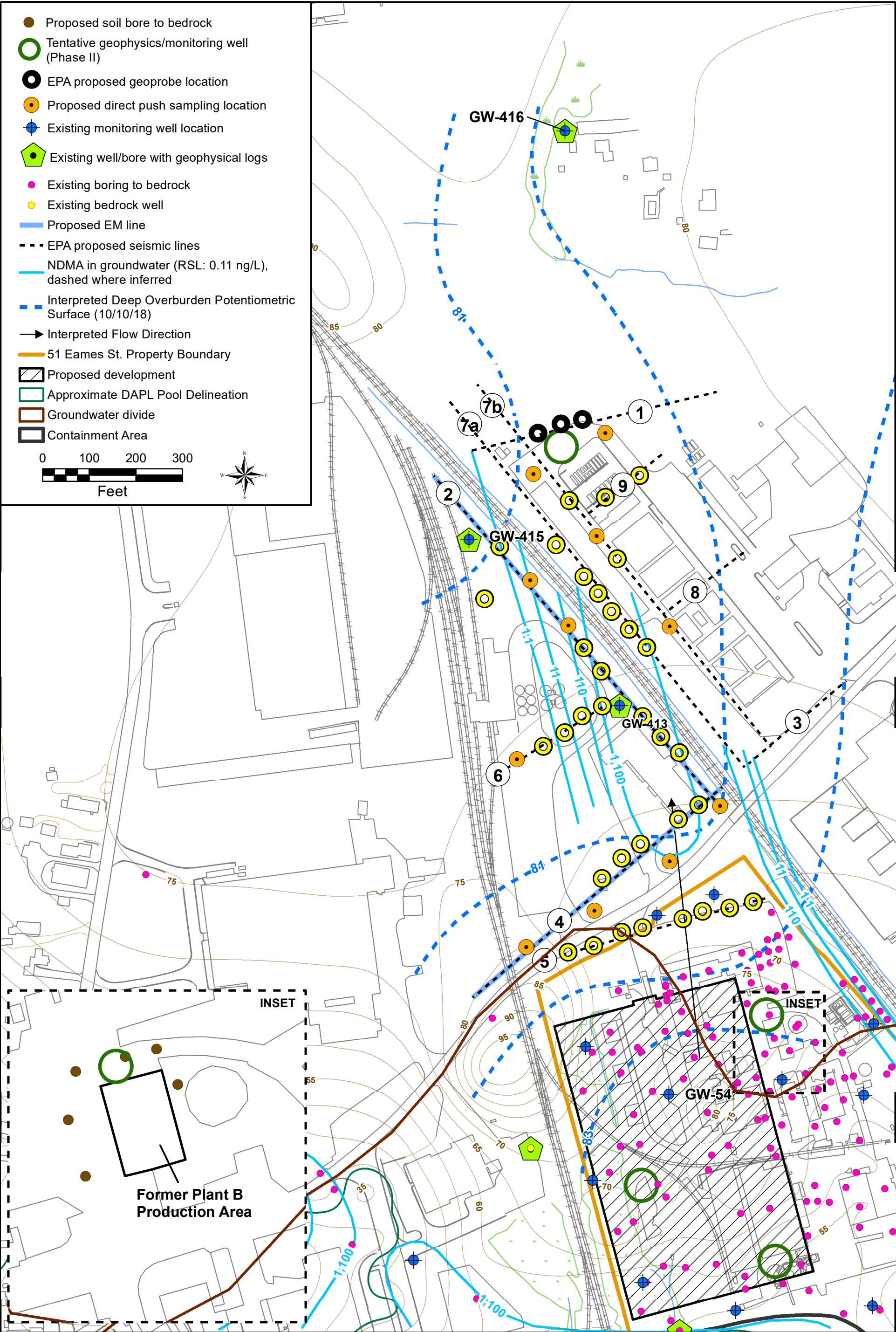


Jewel Drive (OPWD) area showing proposed seismic lines and tentative confirmatory/monitoring wells.

Figure
4



 <p>2/19/20 C181086 Olin</p>	<p>Main Street area showing proposed seismic lines. At least 12 monitoring wells will be installed at tentative boring locations during Phase II.</p>	<p>Figure 5</p>
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North of Olin (GW-413 area) showing proposed seismic lines, direct push sampling, and tentative geophysics/monitoring wells in relation to the NDMA plume (After Wood 2019c). Inset shows proposed soil bore locations around the former Plant B production area.

Figure
7

